

June 12, 2015

7852 Walker Drive, Suite 200 Greenbelt, Maryland 20770 phone: 301-459-7590, fax: 301-577-5575 internet: www.jsitel.com, e-mail: jsi@jsitel.com

Accepted / Filed

JUN 12 2015

Federal Communications Commission Office of the Secretary

# Via Hand Delivery

Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary 445 12<sup>th</sup> Street, SW Washington, DC 20554

Re:

WC Docket No. 14-58

2015 ETC Annual Report of Citizens Hammond NY

Study Area Code 150081

Dear Ms. Dortch:

On behalf of Citizens Hammond NY ("Citizens NY"), JSI files the attached confidential and redacted versions of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission's rules.\(^1\) Citizens seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.\(^2\) The redacted version is also being filed this date via the FCC's Electronic Comment Filing System. In addition, attached is a letter requesting confidential treatment under Sections 0.457 and 0.459 of its Progress Report on its Five-Year Service Quality Improvement Plan as required by Section 54.313(a)(1).\(^3\)

Please direct any questions regarding the filing to the undersigned.

Sincerely,

DOCKET FLE COPY OF SWIL

John Kuykendall JSI Vice President

301-459-7590

jkuykendall@jsitel.com

cc: Charles Tyler, Telecommunications Access Policy Division (two copies, confidential)

No. of Copies rec'd 6

<sup>1</sup> 47 C.F.R. §§ 54.313, 54.422.

3 47 C.F.R. §§ 0.457, 0.459, 54.313(a)(1).

Echelon Building II, Suite 200 9430 Research Blvd., Austin, TX 78759 phone: 512-338-0473, fax: 512-346-0822 Eagandale Corporate Center, Suite 310 1380 Corporate Center Curve, Eagan, MN 55121 phone: 651-452-2660. fax: 651-452-1909

6849 Peachtree Dunwoody Road Bldg. B-3, Suite 200, Atlanta, GA 30328 phone: 770-569-2105, fax: 770-410-1608 547 South Oakview Lane Bountiful, UT 84010 phone: 801-294-4576, fax: 801-294-5124

<sup>&</sup>lt;sup>2</sup> Connect America Fund et al., WC Docket No. 10-90 et al., Protective Order, DA 12-1857 rel. Nov. 16, 2012 (Protective Order). 47 C.F.R. § 54.313(f)(2).



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Onice of the Secretary

Re:

WC Docket No. 14-58

2015 ETC Annual Report of Citizens Hammond NY

Study Area Code 150081 Request for Confidentiality

Dear Ms. Dortch:

John Staurulakis, Inc. ("JSI"), on behalf of its client Citizens Hammond NY (the "Company") hereby requests, pursuant to Sections 0.457 and 0.459 of the Commission's rules, withholding from public inspection certain information contained in an attachment to the above referenced reporting requirement. The Company provides the following in support of its request, numbered consistent with the subparagraphs of Section 0.459(b).

- The information for which the Company is seeking confidential treatment is an attachment to the Company's annual reporting information pursuant to Sections 54.313 and 54.422 of the Commission's rules ("Report").<sup>3</sup>
- Rate-of-Return Eligible Telecommunications Carriers ("ETCs") must file with the Commission an initial section 54.202(a) Five-Year Service Quality Improvement Plan ("Five-Year Plan") which is contained in the attachment to the 2014 Report.<sup>4</sup>
- 3. The information contained in attachment for which the Company seeks the withholding from public inspection is the entirety of data pertaining to the Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment. Information of this nature is confidential commercial information routinely withheld from public inspection.

<sup>1 47</sup> C.F.R. §§ 0.457, 0.459.

<sup>&</sup>lt;sup>2</sup> 47 C.F.R. § 0.459(b)(1) through (9).

<sup>3 47</sup> C.F.R. §§ 54.313, 54.422.

See In the Matter of Connect America Fund, WC Docket No. 10-90, Order DA 14-591 (rel. May 1, 2014).

4. With respect to identifying the degree to which the subject attachment concerns a service that is subject to competition, the information is of a financial and competitive nature regarding the provision of telecommunications services. The Line 112 attachment contains competitively sensitive information related to proposed improvements or upgrades and maintenance the Company's network.

In its March 5, 2013 Order, the FCC. The FCC specified that for rate-of-return carriers, the five-year plans "should describe the carrier's network improvement plan, which should provide greater visibility into current plans to extend broadband service to unserved locations in rate-of-return service territories." Accordingly, because the Company is a rate-of-return carrier, it must file a five-year service improvement plan which contains proprietary, competitively sensitive information related to the Company's existing network including the specific locations of customers as well as describe proposed improvements or upgrades and maintenance of its network throughout its service area. Specifically, this information sets forth services provided by the Company over its existing network including specific locations of customers as well as planned network improvement and maintenance for the years 2015 through 2019 including project start and completion dates, population that will be impacted by the improvements and upgrades at the wire center level and projected capital costs associated with the improvements and upgrades and operating costs associated with maintaining the network including depreciation for investments that have already been made. As such, this information contains competitively sensitive information related to the Company's existing network as well as detailed plans at the wire center level for network upgrades and maintenance projected for the years 2015 through 2019.

- 5. With respect to identifying possible exposure to competitive harm, the information contained in the Line 112 attachment is information that is not customarily released to the public. This information is proprietary to the Company, is unique to the Company's serving territory and is only known to the Company and its authorized agents. If the Information is not protected, it would have economic value to potential competitors who would be able to target their marketing to specific customers. In a competitive telecommunications marketplace, this type of information is highly sensitive. If publicly disclosed, it would enable competitors to craft business plans that capitalize on their knowledge of the locations of the Company's customers which would place the Company at a competitive disadvantage.
- 6. With respect to steps the Company has taken to ensure against unauthorized disclosure of the information contained in the attachment, the Company is filing the attachment under seal. The Company uses the information contained in the Five-Year Plan to ensure that its customers continue to receive state-of-the-art high quality telecommunications and broadband services that the Company has

<sup>&</sup>lt;sup>5</sup> See Connect America Fund et al., WC Docket 10-90 et al., Order, DA 13-332 (rel. Mar. 5, 2013) ("March 5, 2013 Order") at para 9 citing Section 54.202(a) (1) (ii).

# Request for Confidentiality Page 3

been providing to them for many years as well as to satisfy mandatory reporting requirements and does not share the information for which protection is sought. The Company protects the secrecy of this information with a security protocol that ensures the information is not inadvertently disclosed or disseminated. Only directors, managers and employees with a direct need to know are authorized to access the information.

- Any previous versions of this information are not publicly available.
- Because the information is not routinely available, a need exists for maintaining the confidentiality of this information permanently.
- 9. Not applicable.

Based on the preceding, JSI respectfully requests on behalf of the Company that the Commission grant confidential treatment under Section 0.459 to Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment.

Please contact the undersigned with any questions regarding this request.

Sincerely,

John Kuykendall JSI Vice President

301-459-7590

jkuykendall@jsitel.com

Klandell

	m 481 - Carrier Annual Reporting REDAC	TED FOR PUBLIC I	PGCForm (Child Control Salvators)	d N6. 3060-9086/OND Céntral No. 3060-081
-	Study Area Code	150081		
<015>	Study Area Code Study Area Name	CITIZENS HAMMOND NY		
<020>	Program Year	2016		7. 51
<030>	Contact Name: Person USAC should contact	Mark De Perrior		
<035>	with questions about this data  Contact Telephone Number:	3153245911 ext.	1000	
<039>	Number of the person identified in data line <030> Contact Email Address:	markcpa@cit-tele.com		
Poverson	Email of the person identified in data line <030>	markepawere-cere.com	Control and the state of the st	CONTRACTOR DESCRIPTION OF PERSONS AND IN U.S.
AMAUA	L REPORTING FOR ACL CARRIERS		<b>4</b> 1.	(check box when complete)
<100>	Service Quality Improvement Reporting		(complete attached worksheet)	1 HINN
	Outage Reporting (voice)		(complete attached worksheet)	1
<210>	Total Control of the	outages to report		1 15 16 12 1
<300>	Unfulfilled Service Requests (voice) 0			
<310>	Detail on Attempts (voice)			J. C. L. C.
			(attach d	lescriptive document)
<320>	Unfulfilled Service Requests (broadband)			1 Mests
<330>	Detail on Attempts (broadband)		(attach	descriptive document)
<400>	Number of Complaints per 1,000 customers (voice)			
<410>	Fixed 0.0			1 1
<420> <430>	Mobile 0.0  Number of Complaints per 1,000 customers (broads	pand)		
<440>	Fixed 0.0			1 1 1 1 1 1 1 1
<450> <500>	Mobile 0.0 Service Quality Standards & Consumer Protection R	ules Compliance	(check to indicate certification)	
45002	150081ny510.pdf			
<510>			(attached descriptive document)	1 1
<600>	grant and the same of the same		(check to indicate certification)	/ /
	150081ny610.pdf		STARRANDINAL NAME OF THE	
	1		(attached descriptive document)	
<610>				
<700>	Company Price Offerings (voice)		(complete attached worksheet)	
<710> <800>	Company Price Offerings (broadband)  Operating Companies and Affiliates		(complete attached worksheet) (complete attached worksheet)	
	Tribal Land Offerings (Y/N)?	(if ye	es, complete attached worksheet)	111111
<1000>	Voice Services Rate Comparability Certification	Ye	s	- Allina
<1010>			(attach descriptive document)	
<1100>	Certify whether terrestrial backhaul options exist (	res or No) O	(If not, check to indicate certification	on)
<1110>			(complete attached worksheet)	WILL.
<1200>	Terms and Condition for Lifeline Customers	Documentation Media	(complete attached worksheet)	
	Price Cap Carriers, Proceed to Price Cap Additional I Including Rate-of-Return Carriers affiliated with Pri			
<2000>	The state of the s	cop rocal exchange	(check to indicate certification)	
<2005>	Rate of Return Carriers, Proceed to ROR Additional	Documentation Works	(complete attached worksheet)	
<3000>	nase of neturn carriers, Proceed to NOR Additional	Documentation works	(check to indicate certification)	V 111111
<3005>			(complete attached worksheet)	111111

	ervice Quality Improvement Reporting	N. A.		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 30 July 2013	60-0819
<010>	Study Area Code	150081			
<015>	Study Area Name	CITIZENS HAMMON	ID NY		
<020>	Program Year	2016			
<030>	Contact Name - Person USAC should contact regarding this data	Mark De Perrion			
<035>	Contact Telephone Number - Number of person identified in data line <030>	3153245911 ext.			
<039>	Contact Email Address - Email Address of person identified in data line <030>	markcpa@cit-tel	le.com		
<110>	Has your company received its ETC certification from the FCC?	(yes / r	no) O O		
<111>	If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC?	(yes / r	no) O O		
<112>	If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.  Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your CETC which only receives frozen support, your progress report is only required to address voice telephony service.		5008lny112.pdf		
	Please select the appropriate responses below (Yes, No, Not Applicable) to confit that the attached document(s), on line 112, contains a progress report on its five service quality improvement plan pursuant to §54.202(a). The information shall be submitted at the wire center level or census block as appropriate.	e-year		Name of Attached Document	
			Yes		
<113>	Maps detailing progress towards meeting plan targets				
	Maps detailing progress towards meeting plan targets  Report how much universal service (USF) support was received		Yes		
114>		ove service quality	Yes Yes		
<114> <115>	Report how much universal service (USF) support was received  How much (USF) was used to improve service quality and how support was used to improve		Yes		
<113> <114> <115> <116> <117>	Report how much universal service (USF) support was received	prove service coveraç	Yes Yes		

(200) Service Outage Reporting (Voice)	FCC Form 481	
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819	
	July 2013	

<010>	Study Area Code	150081
<015>	Study Area Name	CITIZENS HAMMOND NY
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Mark De Perrior
<035>	Contact Telephone Number - Number of person identified in data line <030>	3153245911 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	markcpa@cit-tele.com

<a></a>	<b1></b1>	<b2></b2>	<b3></b3>	<b4></b4>	<c1></c1>	<c2></c2>	<d></d>	<e></e>	<f></f>	<8>	<h></h>
NORS Reference Number		Outage Start Time		Outage End	Number of Customers Affected	Total Number of Customers	911 Facilities Affected (Yes / No)	Service Outage Description (Check all that apply)	Did This Outage Affect Multiple Study Areas (Yes / No)	Service Outage Resolution	Preventative Procedures
********			****								
-								-			

2,500(5.1.0)(4.0)	te Offerings including Voice Rate Date lection Form	PCE FO(m 48) Olda Control No. 3080-0985/OMB Control No. 3080-0819 Selly 2013
<010>	Study Area Code	150081
<015>	Study Area Name	CITIZENS HAMMOND NY
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Mark De Perrior
<035>	Contact Telephone Number - Number of person identified in data line <030>	3153245911 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	markcpa@cit-tele.com
<701>	Residential Local Service Charge Effective Date  1/1/2015  Single State wide Residential Local Service Charge	

A SECURITION OF THE PARTY OF TH		<a3></a3>		Residential Local	3 (463)	The same of the sa	Mandatory Extended Area	7
State	Exchange (ILEC)	SAC (CETC)	Rate Type	Service Rate	State Subscriber Line Charge	State Universal Service Fee	Service Charge	Total per line Rates and Fee
							*	
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							- Manale III	
				See at	tached worksheet			
				15:50 - 15:00			3.00	
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							NOTE OF THE PROPERTY OF THE PR	

<010> Study Area Code			150081					
			CITIZENS HAMMOND NY	YN CH	200			
<020> Program Year			2016					
<030> Contact Name - Person	Contact Name - Person USAC should contact regarding this data	his data	Mark De Perrior					
<035> Contact Telephone Nu	Contact Telephone Number - Number of person identified in data line <030>	ed in data line <030>	3153245911 ext.					
<039> Contact Email Address	Contact Email Address - Email Address of person identified in data line <030>	ed in data line <030>	markcpa@cit-tele.com	le.com				
বাচ	•		•	9	•	<b>SQD</b>	1899	465
State	Exchange (NEC)	Residential Rate	State Regulated Fees	Total Rate and Fees	Broadband Service - Download Speed (Mbps)	Broadband Service - Upload Speed (Mbps)	Usage Allowance (GB)	Usage Allowance Action Taken When Limit Reached (select)
			Son attached	pad				
			Lawloop and	501				
			WOLKSTIEGE -					

	erating Companies ection Form		FCC Form 482 SMS Gentral No. 3050-0985/OMB Control No. 3050-0819 Sept 2013
<010>	Study Area Code		150081
<015>	Study Area Name		CITIZENS HAMMOND NY
<020>	Program Year		2016
<030>	Contact Name - Person	USAC should contact regarding this data	Mark De Perrior
<035>	Contact Telephone Nun	ber - Number of person identified in data line <030>	3153245911 ext.
<039>	Contact Email Address -	Email Address of person identified in data line <030>	markcpa@cit-tele.com
<810>	Reporting Carrier	Citizens Telephone Company of Hammond, NY	
<811>	Holding Company	Citizens Telephone Company of Hammond NY, Ir	nc.
<812>	Operating Company	Citizens Telephone Company of Hammond, NY	

	ca1> Affiliates	SAC	Ca33  Doing Business As Company or Brand Designation
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Strain and Strain Co.	bal Lands Reporting lection Form		900 Form 481 Chine Control No. 3060-0986/OM8 Control No. 3060-0819 No. 2013
<010>	Study Area Code	Particular Victoria	150081
<015>	Study Area Name		CITIZENS HAMMOND NY
<020>	Program Year		2016
<030>	Contact Name - Person USAC should contact regarding this data		Mark De Perrior
<035>	Contact Telephone Number - Number of person identified in data line	<030>	3153245911 ext.
<039>	Contact Email Address - Email Address of person identified in data line	<030>	markcpa@cit-tele.com
<910>	Tribal Land(s) on which ETC Serves		
<920>	Tribal Government Engagement Obligation		Name of Attached Document
16			
	company serves Tribal lands, please select (Yes,No, NA) for each these boxes		
	rm the status described on the attached document(s), on line 920,		Select
	strates coordination with the Tribal government pursuant to	Y	es or No or
9 34.31.	3(a)(9) includes:	No	lot Applicable
<921>	Needs assessment and deployment planning with a focus on Tribal community anchor institutions.	111	
<922>	Feasibility and sustainability planning;		
<923>	Marketing services in a culturally sensitive manner;		
<924>	Compliance with Rights of way processes		
<925>	Compliance with Land Use permitting requirements		
<926>	Compliance with Facilities Siting rules		
<927>	Compliance with Environmental Review processes		
<928>	Compliance with Cultural Preservation review processes		

<929> Compliance with Tribal Business and Licensing requirements.

E-15-170 948 Zah	o Terrestrial Backhaul Reporting llection Form	FCC Form 483 OMB Control No. 3069-0986/OMB Control No. 3060-0819 July 2018
<010>	Study Area Code	150081
<015>	Study Area Name	CITIZENS HAMMOND NY
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Mark De Perrior
<035>	Contact Telephone Number - Number of person identified in data line <030>	3153245911 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	markcpa@cit-tele.com
<1120>	Please confirm whether terrestrial backhaul options exist within the supported area pursuant to § 54.313(g) (Yes, No).	
<1130>	Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 upstream within the supported area pursuant to § 54.313(g).	kbps

Lifeline	erms and Condition for Lifeline Customers ection Form		FCC Form 483 ONIB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code		150081
<015>	Study Area Name		CITIZENS HAMMOND NY
<020>	Program Year		2016
<030>	Contact Name - Person USAC should contact regarding this data		Mark De Perrior
<035>	Contact Telephone Number - Number of person identified in data	line <030>	3153245911 ext.
<039>	Contact Email Address - Email Address of person identified in data	line <030	> markcpa@cit-tele.com
<1210>	Terms & Conditions of Voice Telephony Lifeline Plans		Name of Attached Document
<1220>	Link to Public Website	НТТР —	
or the we	neck these boxes below to confirm that the attached document(s), on line bsite listed, on line 1220, contains the required information pursuant to (a)(2) annual reporting for ETCs receiving low-income support, carriers mure port:		
<1221>	Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,	1	
<1222>	Details on the number of minutes provided as part of the plan,	<b>/</b>	
<1223>	Additional charges for toll calls, and rates for each such plan.	$\checkmark$	

(2000) Pr	ice Cap Carrier Additional Duckmentation	Professional Control of the Control
OR STEEL STATE	ection Form	CAMB Control No. 3060-0386/CAMB Control No. 3060-0819
are and the	Rate-of-Return Carriers offillated with Price Cap Local Exchange Clariers	and total
merouning	mand process south as a supplied to the suppli	
<010>	Study Area Code	
<015>	Study Area Name	150081
<020>	Program Year	CITIZENS HAPPOND NY
<030>	Contact Name - Person USAC should contact regarding this data	2016
<035>	Contact Telephone Number - Number of person identified in data line <030>	MARK DE PETRIOT
<039>	Contact Email Address - Email Address of person identified in data line <030>	3153245911 ext.
		markcpa@cit-tele.com
AND DESIGNATION OF THE PERSON		
Select the	e appropriate responses below (Yes, No, Not Applicable) to note compliance as	a recipient of incremental Connect America Phase i support, frozen High Cost support, High Cost support to offset access charge reductions, ar
Connect	America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The Inform	mation reported on this form and in the documents attached below is accurate.
	Incremental Connect America Phase I reporting	
<2010>	2nd Year Certification (47 CFR § 54.313(b)(1)i)	
<2011a>	3rd Year Certification (47 CFR § 54.313(b)(1)ii)	
-2011	****	
<2011b>	Attachment (47 CFR § 54.313(b)(1)ii)	
		Name of Attached Document(s) Listing Required Information
	B	CONTROL CONTRO
	Price Cap Carrier Receiving Frozen Support Certification (47 CFR § 54.312(a))	
<2012>	지 아무슨 지금 내지 않는 일 프로리에 되지 않는 지원 집 한 경기를 하는 것이다.	The second secon
<2013>		
<2014>		
<2015>	2016 and future Frozen Support Calculation (47 CFR § 54.313(c)(4))	
	Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}	
<2016>	Certification Support Used to Build Broadband	
	Connect America Phase II Reporting (47 CFR § 54.313(e))	
<2017>	3rd year Broadband Service Certification	
<2018>		
<2019>		
<2020>	Please check the box to confirm that the attached document(s), on lir	ne 2021 contains the required information
	pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support s	shall provide the number, names, and
	addresses of community anchor institutions to which began providing	g access to broadband service in the
	preceding calendar year.	
-2021-	laterias Denovasa Community Anabas Institutions	1
<2021>	Interim Progress Community Anchor Institutions	
		1
		I I
		Name of Attached Document(s) Listing Required information

		The state of the s	Cocument(s) for Balance Sheet, income Statement and Statement of C.	Document(s) for Balance Sheet, Income Statement and Statement of C.									ERher a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications
	Underlying information subjected to a review by an independent certified public accountant. Underlying information subjected to an officer certification. Underlying information subjected to an officer certification.  Document(s) for Ballance Sheet, Income Statement and Statement of Q											Document(s) for Balance Sheet, Income Statement and Statement of Cash Plows  Management letter and audit opinion issued by the independent certified public accountant that performed the compeny's financial audit  If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3016 pursuant to \$5.4.313(f)(2), contains:  Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format copy and the TUS Operating Report for Telecommunications Borrowers,	nt of Cesh Flows filed public accountlant that performed the compeny's financial audit
	Underlying information subjected to a review by an independent certified public accountant. Underlying information subjected to an officer certification. Document(s) for Balance Sheet, Income Statement and Statement of Q											Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows  Managament letter and audit opinion issued by the independent cartified public accountant that performed the compeny's financial audit if the response is no on line 3018, please check the boses below for confirm your submission, on line 3056 pursuant to \$ 54.313(f)(2), contains:  Copy of their financial statement which has been subject to review by an independent cartified aubitic accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications	nt of Cash Flows Blied public accountant that performed the company's financial audit
	Destrowers, Underlying information subjected to a review by an independent certified public accountant Underlying information subjected to an officer certification. Document(s) for Balance Sheet, Income Statement and Statement of Q.	and the second second	and the second second									Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows  Management letter and audit opinion issued by the independent certified public accountant that performed the compeny's financial audit the response is no on like 3028, please check the boxes below to confirm your submission, on line 3026 pursuant to \$ 54.313(f/2), contains:  Coay of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format companable to NUS Operating Report for Telecommunications	nt of Cesh Flows tified public accountant that performed the compeny's financial audit
	Borrowers, Underlying information subjected to a review by an independent certified public accountant. Underlying information subjected to an officer certification. Document(s) for Balance Sheet, Income Statement and Statement of Q	The state of the s	The second second									Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows  Management letter and audit opinion issued by the independent cardified public accountant that performed the compeny's financial audit if the response is no on line 3018, please check the boses below to confirm your submission, on line 3018 pursuant to § 54.313(f)(2), contains:  Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a	nt of Cash Flows Whed public accountant that performed the company's financial audit
	format comparable to RUS Operating Report for Telecommunications Borrowers, Underlying information subjected to a review by an independent certified public accountant Underlying information subjected to an officer certification. Document(s) for Balance Sheet, Income Statement and Statement of Q	COME CAPE IN CONTROL OF THE	CAN DEPT. IN SECURIOR									Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows  Management letter and audit opinion issued by the independent certified public accountant that performed the compeny's financial audit if the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to \$ 54.313(f/2), contains:	nt of Cash Flows fified public accountant that performed the company's financial audit
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<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Mark De Perrior
<035>	Contact Telephone Number - Number of person identified in data line <030>	3153245911 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	markcpa@cit-tele.com

n	
Financial Data Summary	
(3027) Revenue	
(3028) Operating Expenses	
(3029) Net Income	
(3030) Telephone Plant In Service(TPIS)	
(3031) Total Assets	
(3032) Total Debt	
(3033) Total Equity	
(3034) Dividends	

	ios - Reporting Carrier  Ection Form	ALC Form 681 ChAS Control Nov 3850-0185/ONAS Control No. 3050-0185
	T. 医毒素等性中毒性品的性质	ANGEROUS S.
<010>	Study Area Code	150081
<015>	Study Area Name	CITIZENS HAMMOND NY
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Mark De Perrior
<035>	Contact Telephone Number - Number of person identified in data line <030>	3153245911 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	markcpa@cit-tele.com

#### TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

# Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate. Name of Reporting Carrier: Signature of Authorized Officer: Date Printed name of Authorized Officer: Title or position of Authorized Officer: Title or position of Authorized Officer: Study Area Code of Reporting Carrier: Filing Due Date for this form: Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.

Certificat Data Coli	on Agent/Center ection from	Chris Costrol Not 3069-986/Cavis Costrol No. 8060-0819 - 869-2016
<010>	Study Area Code	150081
<015>	Study Area Name	CITIZENS HAMMOND NY
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Mark De Perrior
<035>	Contact Telephone Number - Number of person identified in data line <030>	3153245911 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	markcpa@cit-tele.com

# TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

certify that (Name of Agent)_tfoqlia@isitel.com is authorized to submit the information reported on behalf of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.										
Name of Authorized Agent: tfoglia@jsitel.com										
Name of Reporting Carrier: CITIZENS HAMMOND NY										
Signature of Authorized Officer: CERTIFIED ONLINE	Date: 06/12/2015									
Printed name of Authorized Officer: Mark DePerrior										
Title or position of Authorized Officer: Controller										
Telephone number of Authorized Officer: 3153245911 ext.										
Study Area Code of Reporting Carrier: 150081	Filing Due Date for this form: 07/01/2015									

# TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Re	eciplents on Behalf of Reporting	g Carrier
i, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service su the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the info		
Name of Reporting Carrier: CITIZENS HAMMOND NY		
Name of Authorized Agent or Employee of Agent: tfoglia@jsitel.com		
Signature of Authorized Agent or Employee of Agent: CERTIFIED ONLINE	Date:	06/11/2015
Printed name of Authorized Agent or Employee of Agent: tfoglia@jsitel.com		
Title or position of Authorized Agent or Employee of Agent Manager - Regulatory Affairs		
Telephone number of Authorized Agent or Employee of Agent: 3014597590 ext.		
Study Area Code of Reporting Carrier: 150081 Filing Due Date for this form: 07	7/01/2015	

Attachments

# **REDACTED - FOR PUBLIC INSPECTION**

# **ATTACHMENT - LINE 112**

# Five-Year Network Improvement Plan and Progress Report For

# ATTACHMENT REDACTED IN ENTIRETY

Citizens Telephone Company of Hammond, NY, Inc.'s demonstration of complying with applicable service quality standards and consumer protection rules for voice and broadband services:

In establishing this certification in its 2005 ETC Order,<sup>1</sup> the FCC found that an ETC must make "a specific commitment to objective measures to protect consumers." <sup>2</sup> The Commission found that for wireless ETCs, compliance with CTIA's Consumer Code for Wireless Service would satisfy this requirement" and that the sufficiency of other commitments would be considered on a case-by-case basis. <sup>3</sup> In this context, the FCC stated, "to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement." <sup>4</sup>

Citizens Telephone Company of Hammond, NY, Inc. ("Citizens") hereby certifies that it is complying with applicable service quality standards and consumer protection rules. Citizens is subject to service quality standards and consumer protection obligations under both federal and state law. These standards and obligations include, but are not limited to, the following: (1) providing copies of a tariff, pending tariff, or rate filing which disclose rates, terms and conditions of service to customers in accordance with the New York Code of Rules and Regulations (NYCRR) Title 16, Volume C, Chapter 6,

<sup>&</sup>lt;sup>1</sup> Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) ("2005 ETC Order").

<sup>&</sup>lt;sup>2</sup> Id. at para. 28.

<sup>&</sup>lt;sup>3</sup> Id. The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: "(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy." Id. at n. 71.

Subchapter A, 602.4; (2) adherence to state service quality standards and consumer protection requirements governing telephone providers under NYCRR Title 16, Volume C, Chapter 6, Subchapter A service, Parts 600, 602, 603, and 609; (3) truth-in-billing requirements; and (4) CPNI, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy.

In addition, Citizens certifies compliance with broadband specific consumer protection obligations under both state rule and federal law. The obligation under state rule is NYCRR Title 16, Part 605 as it pertains to common carriage and the delivery of broadband services as a separate service from the provision of content. The federal law obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in F.C.C. 47 C.F.R. Part 8 §8.3. The Company furthermore will comply with all requirements set forth in the 2015 Open Internet Order when it becomes effective.

Citizens Telephone Company of Hammond, NY, Inc.'s demonstration of ability to function in emergency situations for voice and broadband services:

Citizens Telephone Company of Hammond, NY, Inc. ("Citizens") hereby certifies that it is able to function in emergency situations as set forth in §54.202(a)(2). Citizens network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). The Company can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations will also allow the Company to manage traffic spikes throughout its network, as emergency situations require.

Specifically, each central office building is supplied with standby generators and battery back-up that enable the central office to keep running until power is restored so long as fuel is available, or until system changes are made to reroute traffic. The Company has battery backup at all office locations and in its electronic equipment sites. Length of run time is determined by the equipment serving the area and the number of customers working out of the equipment. Generators are installed at all Central Office locations. They will continue to run as long as the Company has access to fuel.

The company's standby generators and battery back-up support both voice and broadband network equipment should an emergency situation occur.

Section 54.202(a)(2) requires ETCs that are designated by the Commission to "demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations."

23.303000	ce Offerings Including Voice Rate Data lection Form	FEX Form 481 Chie Edward No. 3050-0985/OMB Control No. 3050-0819 No. 3815
<010>	Study Area Code	150081
<015>	Study Area Name	CITIZENS HAMMOND NY
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Mark De Perrior
<035>	Contact Telephone Number - Number of person identified in data line <030>	3153245911 ext.
<039>	Contact Email Address - Email Address of person identified in data line <0300	markcpa@cit-tele.com
<701>	Residential Local Service Charge Effective Date 1/1/201	.5
<702>	Single State-wide Residential Local Service Charge	

<703>

State	Exchange (ILEC)	SAC (CETC)	Rate Type	Residential Local Service Rate	State Subscriber Line Charge	State Universal Service Fee	Mandatory Extended Area Service Charge	Total per line Rates and Fee
NY	Hammond		PR	14.6	0.0	0.0	0.0	14.6
MY	Macomb		<b>F</b> R	15.85	0.0	0.0	0.0	15.85
	P1411							

(710) Broadband Price Offerings Data Collection Form	FCC Form 481 Dept Claber Not 3860-0006/Class Control No. 3060-0819 het 2013
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<010>	Study Area Code	150081
<015>	Study Area Name	CITIZENS HAMMOND NY
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Mark De Perrior
<035>	Contact Telephone Number - Number of person identified in data line <030>	3153245911 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	markcpa@cit-tele.com

State	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rates and Fees	Broadband Service - Download Speed (Mbps)	Broadband Service -Upload Speed (Mbps)	Usage Allowance (GB)	Usage Allowance Action Taken When Limit Reached (select)
NY	All	19.95	0.0	19.95	5.0	1.0	999999	Other, No usage allowance
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